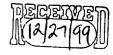




500 Citadel Drive Suite 120, Los Angeles, CA 90040-1572 800-796-7846

December 10, 1999



Dr. Elizabeth Yetley Office of Special Nutritionals Food and Drug Administration 200 C Street SW Washington D.C. 20204

Dear Dr. Yetley:

We are offering for sale the following product Optio Alpha Lipoic Acid, with the following Structure/Function claim: Provides Powerful Antioxidant Support.

The FDA disclaimer will also appear on the label.

Sincerely,

Katie Ferren

Marketing Director

975 - 0162

LET 4725